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Attorney for Defendant Richard Tom  
(Seeking Leave to Withdraw)

**UNITED STATES BANKRUPTCY COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

**MARK NG, LORAIN WONG**  
**AND KENDALL NG**, an individual;

Plaintiff

vs.

**RICHARD TOM**

Defendant

Case No. 19-31024 HLB

Chapter 7

**A.P. No. 19-03065 HLB**

**NOTICE OF HEARING ON MOTION  
FOR ORDER AUTHORIZING  
WITHDRAWAL OF COUNSEL**

**Date:** July 7, 2022

**Time:** 2:00 p.m.

**Place:** Telephonic/ Videoconference  
Courtroom 19  
450 Golden Gate Avenue, 16th fl  
San Francisco, CA

**Judge:** Hon. Hannah L. Blumenstiel

**NOTICE OF MOTION**

TO ALL THE HONORABLE COURT, ALL PARTIES, AND ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that Jeffrey B. Neustadt, the Law Offices of Jeffrey B. Neustadt (the Attorney), counsel of record for Richard Tom, defendant in the above-captioned adversary proceeding, hereby moves for an order authorizing withdrawal of counsel, pursuant to 9013-1, 9013-2, 9013-3, and 9014-1 of the Bankruptcy Local Rules, as well as the Court's June 6, 2022, Order striking the

1 substitution filed June 2, 2022. Unless otherwise heard or granted on shortened time, said motion  
2 shall proceed on July 7, 2022, at 2:00 p.m., in Courtroom 19 of the above Court, located at 450  
3 Golden Gate Avenue in San Francisco, California.

4 Said motion will be based on this notice, the accompanying Motion and Declaration of  
5 counsel, the Court's file in this matter, any Reply, and such things as may be presented at the  
6 hearing.

7 The Client, Richard Tom, has indicated he would not proceed as previously agreed *in this*  
8 *case only* and will not continue with the Attorney as his counsel *in this case only*. He ordered the  
9 Attorney to cease all work in this case, suddenly voicing strong opposition to the plan previously  
10 agreed upon. A substitution of attorneys was executed by Mr. Tom in two places, as client and as  
11 the litigant *pro se* (as his own attorney). That form was filed electronically on June 2, 2022, and  
12 ordered stricken by the Court on June 6, 2022.

13 Counsel for Mr. Tom, the undersigned, has tried to establish and to rehabilitate the relationship  
14 so that the Attorney could carry out representation effectively in this case, but further efforts will not  
15 change the status quo relationship such that the Attorney is no longer able to carry out representation  
16 effectively in this case. Mr. Tom, the client, has terminated Jeffrey B. Neustadt as his attorney herein.  
17  
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19  
20 Date: June 7, 2022

21 Jeffrey B. Neustadt /s/  
22 Jeffrey B. Neustadt  
23 Counsel for Debtor and Defendant  
24 Richard Tom  
25 (Counsel Seeking to Withdraw)  
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NOT. OF MOTION FOR WITHDRAWAL AS COUNSEL